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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 LUZ AQUINO,

13 Plaintiff,

14 vs.

15 PNC MORTGAGE; CLEAR RECON CORP.,

16 Defendants.

Case No. 2:15-cv-00068-GMN-GWF

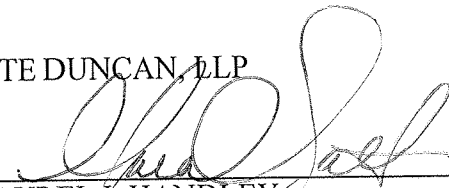
**JOINDER TO 1) NOTICE OF MOTION  
AND MOTION BY PNC BANK, N.A. TO  
DISMISS PLAINTIFF'S COMPLAINT;  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT; AND 2)  
REQUEST FOR JUDICIAL NOTICE**

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18 Defendant, CLEAR RECON CORP. ("Defendant"), by and through its attorneys, Laurel  
19 I. Handley, Esq. and Mara E. Satterthwaite, Esq., of Pite Duncan, LLP, respectfully submits its  
20 Joinder to Defendant, PNC Bank, N.A. d/b/a PNC Mortgage's, Motion to Dismiss Plaintiff's  
21 Complaint [Dkt. #6] and Request for Judicial Notice in Support of Motion to Dismiss [Dkt. #7],  
22 filed on April 8, 2015, in the above-captioned matter. Defendant hereby joins in arguments I-IV,  
23 and VII-X, presented by moving Defendant as to why Plaintiff's Complaint, and each of its  
24 causes of actions alleged as to CLEAR RECON CORP, fails to state a claim upon which relief  
25 may be granted. Each of the specified arguments in the Motion to Dismiss applies with the same  
26 force and effect as to Defendant. Thus, Defendant specifically incorporates and adopts those  
27 arguments here, which provide the Court with a proper basis upon which to dismiss the  
28 Plaintiff's Complaint, with prejudice, pursuant to FRCP 12(b)(6).

1 For all of the reasons stated in the Motion to Dismiss, as well as herein, and pursuant to  
2 the supporting papers and exhibits accompanying the Request for Judicial Notice, it is  
3 respectfully submitted that the Court dismiss Plaintiff's Complaint without granting leave to  
4 amend.

5 Dated this 21 day of April, 2015.

6 PITE DUNCAN, LLP

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8 LAUREL J. HANDLEY  
9 MARA E. SATTERTHWAITE  
Attorneys for Defendant

**CERTIFICATE OF SERVICE**

I, the undersigned, declare: I am, and was at the time of service of the papers herein referred to, over the age of 18 years, and not a party to this action. My business address is 520 South Fourth Street, Suite 360, Las Vegas, Nevada 89101.

I hereby certify that on April 21, 2015, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Andrew A. Bao, [aabao@wolfewyman.com](mailto:aabao@wolfewyman.com)

I further certify that on April 21, 2015, I served the above-described documents by U.S. Mail on the following, who are not registered participants of the CM/ECF System:

Luz Aquino  
395 Wigwam Avenue  
Las Vegas, Nevada 89123

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 21 day of April, 2015, at Las Vegas, Nevada.

  
NICOLE L. LANE